

**PAM BASSEL STANDING CHAPTER 13 TRUSTEE**

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**UNITED STATES BANKRUPTCY COURT  
 NORTHERN DISTRICT OF TEXAS  
 FORT WORTH DIVISION**

**IN RE:****CASE NO. 17-43890-ELM-13****ANGEL REE SANSOM**

2315 WESTBROOK DR  
 CARROLLTON, TX 75007  
 SSN/TIN: XXX-XX-7205

**DEBTOR(S)****HEARING: 7/5/2019 @ 8:30 A.M**

**REPLY TO RESPONSE TO NOTICE TO DEEM MORTGAGE CURRENT OR, ALTERNATIVELY, NOTICE OF  
 AMOUNT DEEMED NECESSARY TO CURE  
 (Mid Case Mortgage Notice per L.B.R. 3002.1-1)**

NOW COMES, Pam Bassel, Standing Chapter 13 Trustee, and files this Reply to Response to Notice to Deem Mortgage Current or, Alternatively, Notice of Amount Deemed Necessary to Cure (Mid Case Mortgage Notice per L.B.R. 3002.1-1) (hereinafter "the Notice") and would respectfully show the Court as follows:

1. The Trustee DENIES that the Debtor is post-petition due in the amount of \$12,752.48.
2. The Trustee has made post-petition monthly mortgage payments to the Mortgage Lender totaling \$16,930.26 for payments due December 2017 to March 2019:

<u>Date</u>	<u>Payee / Batch</u>	<u>Payee / Reserve Name</u>	<u>Check / Source</u>	<u>Description</u>	<u>Disbursements</u>
4/24/2019	<u>2</u>	<u>FIRST UNITED BANK &amp; TRUST COMPANY</u>	<u>3084714</u>	Disbursement to Creditor - Continuing Debt - MONTHLY DISBURSEMENTS Feb/2019 thru Mar/2019	\$3,282.22
12/26/2018	<u>2</u>	<u>FIRST UNITED BANK &amp; TRUST COMPANY</u>	<u>3080522</u>	Disbursement to Creditor - Continuing Debt - MONTHLY DISBURSEMENTS Jan/2019	\$974.86
11/30/2018	<u>2</u>	<u>FIRST UNITED BANK &amp; TRUST COMPANY</u>	<u>3079473</u>	Disbursement to Creditor - Continuing Debt - MONTHLY DISBURSEMENTS Dec/2018	\$974.86
10/30/2018	<u>2</u>	<u>FIRST UNITED BANK &amp; TRUST COMPANY</u>	<u>3078324</u>	Disbursement to Creditor - Continuing Debt - MONTHLY DISBURSEMENTS Nov/2018	\$974.86
9/25/2018	<u>2</u>	<u>FIRST UNITED BANK &amp; TRUST COMPANY</u>	<u>3077233</u>	Disbursement to Creditor - Continuing Debt - MONTHLY DISBURSEMENTS Oct/2018	\$974.86
8/28/2018	<u>2</u>	<u>FIRST UNITED BANK &amp; TRUST COMPANY</u>	<u>3076139</u>	Disbursement to Creditor - Continuing Debt - MONTHLY DISBURSEMENTS Sep/2018	\$974.86
7/31/2018	<u>2</u>	<u>FIRST UNITED BANK &amp; TRUST COMPANY</u>	<u>3075003</u>	Disbursement to Creditor - Continuing Debt - MONTHLY DISBURSEMENTS Aug/2018	\$974.86
6/26/2018	<u>2</u>	<u>FIRST UNITED BANK &amp; TRUST COMPANY</u>	<u>3073867</u>	Disbursement to Creditor - Continuing Debt - MONTHLY DISBURSEMENTS Jul/2018	\$974.86
5/29/2018	<u>2</u>	<u>FIRST UNITED BANK &amp; TRUST COMPANY</u>	<u>3072754</u>	Disbursement to Creditor - Continuing Debt - MONTHLY DISBURSEMENTS Jun/2018	\$974.86
4/30/2018	<u>2</u>	<u>FIRST UNITED BANK &amp; TRUST COMPANY</u>	<u>3071594</u>	Disbursement to Creditor - Continuing Debt - MONTHLY DISBURSEMENTS May/2018	\$974.86

3/27/2018	<u>2</u>	<u>FIRST UNITED BANK &amp; TRUST COMPANY</u>	<u>3070458</u>	Disbursement to Creditor - Continuing Debt - MONTHLY DISBURSEMENTS Apr/2018	\$974.86
2/27/2018	<u>2</u>	<u>FIRST UNITED BANK &amp; TRUST COMPANY</u>	<u>3069396</u>	Disbursement to Creditor - Continuing Debt - MONTHLY DISBURSEMENTS Dec/2017 thru Mar/2018	\$3,899.44
				<b>Totals:</b>	<b>\$16,930.26</b>

3. The Trustee has made post-petition GAP payments to the Mortgage Lender totaling \$1,949.72:

<u>Date</u>	<u>Payee / Batch</u>	<u>Payee / Reserve Name</u>	<u>Check / Source</u>	<u>Description</u>	<u>Disbursements</u>
3/27/2018	<u>3</u>	<u>FIRST UNITED BANK &amp; TRUST COMPANY</u>	<u>3070458</u>	AMOUNTS DISBURSED TO CREDITOR - MONTHLY DISBURSEMENTS	\$492.60
2/27/2018	<u>3</u>	<u>FIRST UNITED BANK &amp; TRUST COMPANY</u>	<u>3069396</u>	AMOUNTS DISBURSED TO CREDITOR - MONTHLY DISBURSEMENTS	\$1,457.12
				<b>Totals:</b>	<b>\$1,949.72</b>

WHEREFORE, Trustee prays that the Court APPROVE the Trustee's Notice to Deem Mortgage Current or, Alternatively, Notice of Amount Deemed Necessary to Cure (Mid Case Mortgage Notice per L.B.R. 3002.1-1), DEEM the amount necessary to cure pre-petition mortgage arrears \$0.00 as of the date of the Trustee's Notice, DEEM the post-petition Gap payments \$0.00 as of the date of the Trustee's Notice, DEEM the Debtor current on post-petition monthly mortgage payments through March 2019 as of the date of the Trustee's Reply, and for general relief.

Respectfully submitted,

By: /s/ Ethan S. Cartwright  
 Ethan S. Cartwright, Staff Attorney  
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#### CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served on or before the date of filing. Service was accomplished electronically and/or by first class mail on the Debtor(s), Debtor's attorney, all parties entitled to electronic notice, and the parties listed below, if any.

/s/ Ethan S. Cartwright  
 Ethan S. Cartwright

BARRETT DAFFIN FRAPPIER TURNER & ENGEL LLP, 4004 BELT LINE RD STE 100, ADDISON, TX 75001  
 FIRST UNITED BANK & TRUST COMPANY, 2805 N DALLAS PKWY STE 525, PLANO, TX 75093  
 PRUYN LAW FIRM PLLC, 2311 CANAL ST STE 124, HOUSTON, TX 77003